



Phone: (718) 971-9474 | **Fax:** (718) 865-0943 | **Email:** Jonathan@shalomlawny.com
Office: 105-13 Metropolitan Avenue Forest Hills, New York 11375

October 12, 2021

VIA ECF

Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Michelle Tenzer-Fuchs v. Jaguar Land Rover North America, LLC.; Case No. 2:21-cv-04941-BMC

Dear Judge Cogan,

As you may already know, the undersigned represents Plaintiff Michelle Tenzer-Fuchs (hereinafter "Plaintiff") in this matter, which involves claims asserted under Title III of the ADA, 42 U.S.C. § 12181.

The Initial Conference for this matter was initially scheduled for Thursday, October 14, 2021 at 10:00 am. The undersigned had filed a letter motion for leave Amend Plaintiff's complaint on September 27, 2021 (Dkt No. 5) followed by an Amended Complaint on September 29, 2021 (Dkt No. 8) and Proposed Summons on October 1, 2021 (Dkt No. 9). To date, Plaintiff was not issued a Summons for Jaguar Land Rover North America, LLC. As a result, Plaintiff has not served its Amended Complaint against Jaguar Land Rover North America, LLC.

At this time, the undersigned respectfully requests the upcoming Initial Conference scheduled for Thursday, October 14, 2021 at 10:00 am be adjourned an additional 60 days in order to provide Defendant additional time to appear in this matter via counsel. This is the first request for an adjournment of the Initial Conference.

Thank you for your time and consideration of the above request.



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Respectfully submitted,

/s/Jonathan Shalom
Jonathan Shalom, Esq.